

1 Neal A. Potischman (SBN 254862)
2 Serge A. Voronov (SBN 298655)
3 1600 El Camino Real
4 Menlo Park, California 94025
5 Tel: (650) 752-2000
6 Fax: (650) 752-2111
7 neal.potischman@davispolk.com
8 serge.voronov@davispolk.com

6 Edmund Polubinski, III (*pro hac vice*)
7 Andrew S. Gehring (*pro hac vice*)
DAVIS POLK & WARDWELL LLP
8 450 Lexington Avenue
New York, New York 10017
9 Tel: (212) 450-4000
Fax: (212) 701-5800
10 edmund.polubinski@davispolk.com
11 andrew.gehring@davispolk.com

12 | *Counsel for Defendant Tezos Stiftung*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

16 IN RE TEZOS SECURITIES LITIGATION

Master File No. 17-cv-06779-RS

18 | This document relates to:

CLASS ACTION

ALL ACTIONS.

**STIPULATION AND [PROPOSED]
ORDER SETTING BRIEFING
SCHEDULE AND CONTINUING
HEARING ON MOTION FOR CLASS
CERTIFICATION**

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1 WHEREAS, on March 16, 2018, this Court appointed Arman Anvari lead plaintiff in this
2 action (Dkt. No. 101);

3 WHEREAS, on September 6, 2018, this Court set April 24, 2019 as the hearing date for
4 lead plaintiff's motion for class certification (Dkt. No. 165);

5 WHEREAS, the parties have propounded discovery requests on each other, and such
6 discovery is ongoing;

7 WHEREAS, on November 21, 2018, lead plaintiff added Pumaro LLC ("Pumaro") as an
8 additional named plaintiff (Dkt. No. 183), and defendants thereafter propounded discovery
9 requests to Pumaro;

10 WHEREAS, on January 7, 2019, plaintiffs added Artiom Frunze ("Frunze") as an
11 additional named plaintiff (Dkt. No. 186), and defendants thereafter propounded discovery
12 requests to Frunze;

13 WHEREAS, on January 23, 2019, plaintiffs filed a motion for class certification, seeking
14 the appointment of Pumaro and Frunze as class representatives (the "Class Certification
15 Motion") (Dkt. No. 193);

16 WHEREAS, the current deadlines for defendants to file opposition papers and for
17 plaintiffs to file reply papers in connection with the Class Certification Motion are, respectively,
18 February 6, 2019 and February 13, 2019;

19 WHEREAS, on January 25, 2019, plaintiffs filed a motion to withdraw Anvari as lead
20 plaintiff and to substitute Frunze as lead plaintiff (the "Substitution Motion") (Dkt. No. 196);

21 WHEREAS, in light of the recent addition of named plaintiffs, the proposed withdrawal
22 of lead plaintiff Anvari, the pendency of the Substitution Motion, and the ongoing nature of
23 discovery that the parties have served, the parties believe that it would be appropriate to continue
24 the hearing on the Class Certification Motion and to set a briefing schedule that will allow the
25 parties adequate time to complete relevant discovery and to brief relevant issues in advance of
26 the hearing date; and

27 WHEREAS, this is the parties' first request to modify the schedule in connection with
28 plaintiffs' Class Certification Motion;

1 IT IS HEREBY STIPULATED AND AGREED, subject to the Court's approval, by the
2 undersigned counsel on behalf of all parties as follows:

- 3 1. Defendants shall file their opposition to the Class Certification Motion on or
4 before May 15, 2019;
- 5 2. Plaintiffs shall file their reply in support of the Class Certification Motion on or
6 before July 15, 2019;
- 7 3. The hearing on the Class Certification Motion shall be continued to July 31, 2019,
8 at 1:30 p.m., or such other date as is convenient for the Court; and
- 9 4. Except as expressly set forth herein, nothing in this stipulation shall be construed
10 as waiving any of the parties' rights, including in connection with the Substitution
11 Motion.

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Dated: January 30, 2019

Respectfully submitted,
DAVIS POLK & WARDWELL LLP

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3 By: /s/ Neal A. Potischman
4 Neal A. Potischman (SBN 254862)
5 Serge A. Voronov (SBN 298655)
6 1600 El Camino Real
7 Menlo Park, California 94025
Telephone: (650) 752-2000
Facsimile: (650) 752-2111
Email: neal.potischman@davispolk.com
serge.voronov@davispolk.com

8
9 Edmund Polubinski III (*pro hac vice*)
10 Andrew S. Gehring (*pro hac vice*)
11 DAVIS POLK & WARDWELL LLP
12 450 Lexington Avenue
13 New York, New York 10017
Telephone: (212) 450-4000
Facsimile: (212) 701-5800
Email: edmund.polubinski@davispolk.com
andrew.gehring@davispolk.com

14
15 Grant P. Fondo (SBN 181530)
16 GOODWIN PROCTER LLP
17 601 Marshall Street
18 Redwood City, California 94063
Telephone: (650) 752-3100
Facsimile: (650) 853-1038
Email: gfondo@goodwinlaw.com

19
20 Nicholas A. Reider (SBN 296440)
21 GOODWIN PROCTER LLP
22 Three Embarcadero Center
23 San Francisco, California 94111
Telephone: (415) 733-6000
Facsimile: (415) 677-9041
Email: nreider@goodwinlaw.com

24
25 Daniel P. Roeser (*pro hac vice*)
26 Charles A. Brown (*pro hac vice*)
27 GOODWIN PROCTER LLP
28 620 Eighth Avenue
New York, New York 10018
Telephone: (212) 813-8800
Facsimile: (212) 355-3333
Email: droeser@goodwinlaw.com
cbrown@goodwinlaw.com

29
30 *Attorneys for Defendant Tezos Stiftung*

1 Dated: January 30, 2019

LTL ATTORNEYS LLP

2 By: /s/ Hung G. Ta
3 Enoch H. Liang
4 LTL ATTORNEYS LLP
5 601 Gateway Boulevard, Suite 1010
6 South San Francisco, California 94080
7 Tel: 650-422-2130
8 Fax: 213-612-3773
9 enoch.liang@ltlattorneys.com

10 James M. Lee
11 Caleb H. Liang
12 LTL ATTORNEYS LLP
13 300 S. Grand Ave., 14th Floor
14 Los Angeles, California 90071
15 Tel: 213-612-8900
16 Fax: 213-612-3773
james.lee@ltlattorneys.com
caleb.liang@ltlattorneys.com

17 Hung G. Ta
18 JooYun Kim
19 HUNG G. TA, ESQ., PLLC
20 250 Park Avenue, 7th Floor
21 New York, New York 10177
22 Tel: 646-453-7288
23 Fax: 646-453-7289
24 hta@hgtlaw.com
25 jooyun@hgtlaw.com

26 *Lead Counsel for Court-Appointed Lead
27 Plaintiff and the Class*

28 William R. Restis
THE RESTIS LAW FIRM, P.C.
550 West C Street, Suite 1760
San Diego, California 92101
Tel: 619.270.8383
william@restislaw.com

Joe J. DePalma
Bruce D. Greenberg
LITE DEPALMA GREENBERG, LLC
570 Broad Street, Suite 1201
Newark, NJ 07102
Tel: (973) 623-3000
Fax: (973) 623-0858
Jdepalma@litedepalma.com
bgreenberg@litedepalma.com

Additional Counsel for the Class

1 Dated: January 30, 2019

COOLEY LLP

2 By: /s/ Patrick E. Gibbs

3 Patrick E. Gibbs (SBN 183174)
4 Jessica Valenzuela Santamaria (SBN 220934)
5 David S. Houska (SBN 295918)
6 Jessie A.R. Simpson Lagoy (SBN 305257)
7 3175 Hanover Street
8 Palo Alto, CA 94304-1130
9 Telephone: (650) 843-5000
Facsimile: (650) 849-7400
Email: pgibbs@cooley.com
jvs@cooley.com
dhouska@cooley.com
jsimpsonlagoy@cooley.com

10 *Attorneys for Defendant*
11 *Dynamic Ledger Solutions, Inc.*

12 Dated: January 30, 2019

BAKER MARQUART LLP

13 By: /s/ Brian E. Klein

14 Brian E. Klein (SBN 258486)
15 Scott M. Malzahn (SBN 229204)
16 Donald R. Pepperman (SBN 109809)
17 Teresa L. Huggins (SBN 263257)
18 BAKER MARQUART LLP
19 777 S. Figueroa St., Suite 2850
20 Los Angeles, CA 90017
21 Telephone: (424) 652-7800
Facsimile: (424) 652-7850
Email: bklein@bakermarquart.com
smalzahn@bakermarquart.com
dpepperman@bakermarquart.com
thuggins@bakermarquart.com

22 *Attorneys for Defendants*
23 *Dynamic Ledger Solutions, Inc.,*
24 *Arthur Breitman, and Kathleen Breitman*

FILER'S ATTESTATION

Pursuant to Civil L. R. 5-1(i)(3), regarding signatures, Neal A. Potischman hereby attests that concurrence in the filing of the document has been obtained from all of the signatories above.

Dated: January 30, 2019

/s/ Neal A. Potischman

Neal A. Potischman

* * *

[PROPOSED] ORDER

PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

Dated: 1/31/19


HONORABLE RICHARD SEEBOORG
U.S. DISTRICT JUDGE